

Daniel Zohny (DZ7311)
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOSE ORTIZ p/k/a JAO

Plaintiff,

07 CV 3897
(RWS)

-against-

ECF CASE

GUITIAN BROTHERS MUSIC INC., OSCAR
GUITIAN, and UNIVERSAL MUSIC GROUP
DISTRIBUTION, INC.

NOTICE OF MOTION

Defendant(s).

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C O U N S E L:

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Daniel Zohny, dated January 30, 2008, the exhibits attached thereto, and all the pleadings and proceedings heretofore had herein, Plaintiff Jao Ortiz p/k/a Jao, shall move this Court before the Honorable Robert W. Sweet on the 20th day of February, 2008, at the United States Courthouse located at 500 Pearl Street, New York, New York, at 12:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, for the entry of a default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure against defendants Guitian Brothers Music, Inc. and Oscar Guitian awarding the plaintiff a permanent injunction, monetary damages in an amount to be determined by the Court, costs and disbursement, including reasonable attorneys' fees, in an amount to be

determined by the Court, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 6.1 (b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, answering papers, if any, are required to be served within ten (10) business days after service of the moving papers.

Dated: New York, New York
January 31, 2008

Respectfully submitted,

ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK, P.C.

By: 

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